



A Guide to Buying Recycled:

The Air Force Affirmative Procurement Program

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A Guide to Buying Recycled

SECTION 1: INTRODUCTION

What is
Affirmative
Procurement?

The purchase of environmentally preferable products manufactured from recycled and reclaimed materials defines the program known as “affirmative procurement.” Both the DoD and Air Force Pollution Prevention Strategies call for the development of affirmative procurement programs.

Focus of this
Guide

This guide focuses on making Air Force consumers aware of EPA requirements to purchase products containing recycled and reclaimed materials (referred to subsequently as “recycled-content products”) instead of purchasing products made entirely from virgin materials. Once aware of these requirements, installation personnel can use the information in this guide to initiate actions through various channels to purchase recycled-content products. Although Executive Order 12873 encourages us to go beyond EPA’s present requirements and consider a full spectrum of environmental factors in our acquisitions, the specific focus of this Guide is to ensure that all AF purchases comply with EPA-designated recycled content guidelines. (Please see Chapter 2 for more discussion on Executive Order 12873.)

Benefits

Affirmative procurement provides a substantial opportunity to benefit both the mission and the environment:

- Purchasing reasonably priced recycled-content products demonstrates that the AF is a good neighbor and steward of the environment. This contributes to sound waste management practices and shows Air Force commitment to environmental quality. (Please see Chapter 2 for discussion of reasonable pricing.)
- For the nation to fully recognize the benefits of recycling and resource recovery, there must be commercial markets available for recycled or recovered materials. DoD and the Air Force have the purchasing power to spur the development of commercial markets and raise the demand for recycled-content products. The result is less waste disposal and a safer environment.

- As the program matures, revenues from recycling programs will increase; costs for recycled-content products will decrease; dependence on landfilling and requirements for virgin material use will decrease. The resulting savings in money and resources will ultimately improve our readiness.
- Environmental and financial gains can be achieved on a national level. Promoting waste prevention by purchasing recovered items can slow the use of virgin material and the rate at which our landfills become filled and closed. This is especially true for paper since paper takes up roughly one-third of the space in landfills nationwide. Federal government procurement and use of recycled products, especially re-refined oil, can reduce our nation's dependency on foreign governments for raw materials.

Air Force "consumers" are subject to mandates for acquiring recycled-content products. These mandates apply equally to consuming activities and to supporting organizations such as base supply and contracting. Some of the major consumers on an Air Force installation are Civil Engineering, Transportation, Maintenance and administrative activities, but all base organizations have a role to play.

Organization of this Guide

Section 2 summarizes the Federal requirements and Air Force policy for affirmative procurement. Section 3 describes the actions necessary to execute your affirmative procurement program.

Appendix A includes detailed lists of products covered by EPA's affirmative procurement guidelines, and the specific requirements for recycled material content. Appendix B provides resources for developing specifications for substitute products. Appendix C furnishes sample forms for affirmative procurement program execution. Appendix D provides a comprehensive list of recycled-content product information sources including Federal government and private sector organizations. Please refer to this appendix for addresses and phone numbers. Appendix E is a Glossary.

The information in this Guide can serve as a foundation for the education process you must undertake as you implement the affirmative procurement program at your installation. A successful affirmative procurement program results from raising consumer awareness basewide and working as a team to identify and acquire recycled-content products.

SECTION 2:

AFFIRMATIVE PROCUREMENT PROGRAM REQUIREMENTS

Overview

This section summarizes the regulatory and legislative background and describes DoD and Air Force requirements for recycled-content product procurement. Our goal with respect to affirmative procurement is to comply with these requirements in such a way as to minimize operational impact and the associated costs.

SECTION 2.1: Resource Conservation and Recovery Act (RCRA)

Affirmative procurement requirements are the result of Section 6002 of RCRA (42 USC 6962), enacted in 1976; Executive Order (EO) 12873, issued in 1993; and EO 12995, which amends EO 12873 and was issued March 25, 1996. Congressional findings which serve as foundation to the requirements of 42 USC 6962 are detailed in 42 USC 6901-6907. As far back as 1976, Congress noted that “millions of tons of recoverable material which could be used are needlessly buried each year.” RCRA established several objectives for protecting health and the environment and conserving valuable resources, through improved solid waste management and resource recovery practices.

Section 6002 requires that Federal government agencies give preference in their purchasing programs to products and practices that conserve and protect natural resources and the environment. Affirmative procurement programs are established to accomplish this. RCRA requires affirmative procurement programs to have, at a minimum, the following four elements:

- A preference program in which the agency shows its preference for recycled products by procuring items that meet recycled-content standards and specifications
- A promotion program designed to educate employees, contractor personnel, and potential bidders on possibilities and procedures for affirmative procurement initiatives

- Procedures for obtaining and discussing certifications with product vendors to verify recycled/recovered material content
- Procedures for monitoring and annually reviewing the effectiveness of the affirmative procurement program by tracking purchases and maintaining records of products containing recycled materials.

Federal agencies purchasing designated items (see Section 2.2) must purchase the item with the highest percentage of recovered materials practicable, consistent with price, performance, competition, and availability. Refer to the tables in Appendix A for EPA's specific requirements on pre- and post-consumer recycled content. RCRA also requires all procuring agencies to eliminate any exclusions of recovered materials and any requirement that items be manufactured from virgin materials, when reviewing or drafting specifications for items to be procured by the agency.

SECTION 2.2: Executive Order (E.O.) 12873 and EPA Guideline Requirements

EO 12873, "Federal Acquisition, Recycling, and Waste Prevention" sets forth implementing procedures for RCRA's affirmative procurement requirements. EO 12873 requires agencies to consider the following factors in acquisition planning: elimination of virgin material requirements; use of recovered materials; product reuse, life cycle cost; recyclability; environmentally preferable products; waste prevention (including toxicity reduction/elimination); and ultimate disposal. In addition to requiring recycled-content purchasing, EO 12873 requires Federal agencies to promote the electronic transfer of documents; to ensure government documents printed internally are printed double-sided; and to include requirements in contracts for documents to be printed double-sided on recycled paper.

Most importantly for our Affirmative Procurement program, EO 12873 required the Environmental Protection Agency (EPA) to designate items that are or can be made with recovered materials. It also requires agencies to review and revise Federal and military specifications to enhance purchase of products containing recycled materials, or that are otherwise environmentally preferable.

EPA Guideline Items and Content Standards

EPA designates recycled content items in the Comprehensive Procurement Guideline (CPG), hence they are known as EPA "Guideline Items." EPA also prepares Recovered Materials Advisory Notices (RMANs). These companion documents to the CPG contain recommended minimum recovered material content standards (summarized in Appendix A) for designated items, plus recommendations for specifications and purchase mechanisms.

To date, the CPG has established the mandatory procurement of 24 items. EPA published the current CPG in the May 1, 1995 Federal Register (60 FR 21370). It is codified at 40 CFR 247 and accomplishes the following:

- Consolidates designations from EPA's five earlier procurement guidelines (paper and paper products, re-refined lubricating oil, retread tires, building insulation, and cement and concrete containing fly ash)
- Designates 19 new items organized along the following product categories: paper and paper products, vehicular products, construction products, transportation products, park and recreation products, landscaping products, and nonpaper office products.

Recycled content standards will continue to evolve. EO 12995, which amends EO 12873, raises the minimum content standard for almost all Federal government agency office paper from 20 percent to 30 percent post-consumer material beginning on December 31, 1998. EPA is also in the process of proposing thirteen additional Guideline Items (Federal Register, 7 November 1996; see item list in Appendix A). After considering public comments, EPA will publish the final rule. The requirements will be effective one year after rule publication. EPA plans to make fact sheets on the updated CPG available on the Internet; see Appendix D for contact information.

Conditions for Exemption from EPA Content Requirements

When making local purchases (not acquiring items from stock-listed sources), any decision not to procure Guideline Items meeting EPA standards shall be based on a written determination that such items:

- Are not available within a reasonable period of time, or
- Fail to meet the performance standards set forth in applicable specifications or fail to meet reasonable performance standards of the procuring agency, or
- Are not available from a sufficient number of sources to maintain a satisfactory level of competition (i.e., available from two or more sources), or
- Are only available at an unreasonable price.

For Air Force purposes, “unreasonable price” is defined as follows: If the cost of the recycled-content product exceeds the cost of a non-recycled item then it is considered unreasonable.

Applicability of EPA Requirements

The current CPG requirements became effective 1 May 1996 and apply to all Federal agencies, to State and local agencies using appropriated funds to procure designated items, and to these agencies’ contractors. EPA’s Guidelines specifically state that RCRA Section 6002 requirements apply to Federal agencies, whether or not appropriated Federal funds are used for procurement of the designated items.

These requirements apply to agencies who purchase more than \$10,000 or more worth of one of the Guideline Items during the course of a fiscal year. This clearly applies to DoD, and subsequently to the Air Force. We are required to establish affirmative procurement programs meeting the requirements of RCRA Section 6002. However, this does not mean that waivers and reporting are necessarily required for each individual purchase involving recycled-content items. This will be discussed further in later sections of this Guide.

SECTION 2.3: Air Force Requirements

Affirmative Procurement programs are required of all AF installations in CONUS and overseas. DoD Instruction 4715.4, Pollution Prevention, calls for program establishment in accordance with RCRA and EO 12873. Air Force Instruction (AFI) 32-7006, Environmental Program in Foreign Countries, provides information on the solid waste, hazardous material, and hazardous waste requirements for installations in foreign countries. The

revised Overseas Environmental Baseline Guidance Document (currently in draft) contains a new chapter on pollution prevention, including the requirement to establish an affirmative procurement program.

Affirmative Procurement is also addressed in AFI 32-7080, "Pollution Prevention Program," dated May 12, 1994, and the 24 July 1995 "Air Force Pollution Prevention Strategy." The Strategy sets program goals, and the AFI provides program guidance.

AFI 32-7080 calls for MAJCOMs to establish procurement programs for all EPA Guideline Items, and for each installation to review and revise its specifications for these designated items. It also provides the flexibility to design the program as long as it meets the RCRA and DoD requirements. Finally, the AFI states we will acquire recycled materials based on EPA procurement guidelines. This means the EPA "recommended" minimum content standards given in the RMANs are no longer recommendations, but are **requirements** for the Air Force, unless one of the exemptions listed in Section 2.2 applies.

The AF Installation Pollution Prevention Program Guide includes this goal for the Affirmative Procurement component of the pollution prevention program: "100% of all products purchased each year in each of EPA's 'Guideline Item' categories shall contain recycled materials meeting EPA's Guideline Criteria."

When making local purchases of Guideline Items, any decision not to acquire items meeting EPA content standards must be based on one of the exemptions and a written determination must be prepared. Where repetitive purchases of the same items are made, an annual blanket determination may be approved. All written determinations must be approved by a general officer or member of the SES of the requiring activity (the functional unit having the requirement), or for requiring activities without a general officer or SES, the commander of the activity. This typically will be a unit's squadron commander. For example: A transportation squadron finds recycled-content traffic cones will take six weeks to get and they need cones tomorrow. The transportation squadron commander, as head of the

requiring activity, can approve the exemption and sign the determination.

Reporting

Currently, formal reporting is limited to contracts having a total value greater than \$100,000 which include the purchase of any amount of EPA Guideline Items. Metrics and reporting are discussed further in Section 3.5.

SECTION 3:

IMPLEMENTING A RECYCLED PRODUCTS PROGRAM

SECTION 3.1: Program Requirements

The installation commander (or the commander of a geographically separated unit) has overall responsibility for implementing an affirmative procurement program compliant with public law, EOs, DOD and AF policies and regulations, as well as applicable state or local requirements.

The base Environmental Protection Committee (EPC) or Environmental Leadership Council (ELC) will designate a program manager/team leader (typically the Civil Engineering Environmental Flight) to coordinate the program among all functional areas including the Public Affairs Office, Base Supply, Contracting, Bioenvironmental Engineering Flight, Logistics maintenance squadrons, Civil Engineering operations and Environmental Flight/Environmental Management, and Legal Office. We highly recommend participation of Base Exchange and Services squadrons/divisions, AAFES, and Commissary. (AAFES and Commissary participation should be focused on the items they procure for their own use, rather than on influencing retail sales of recycled-content products.) The functional areas will identify representatives to participate in the base's affirmative procurement team. The team will report their progress to the EPC or ELC.

Issues for the Affirmative Procurement Team

The team must address many issues:

- Determining the applicable use of recycled-content products across all installation activities
- Complying with purchasing requirements
- Developing an installation education program to support recycling and affirmative procurement efforts
- Managing public awareness campaigns for the installation's recycling and reuse programs
- Supporting the installation's landscaping program by turning green waste into mulch and compost

- Coordinating recycling efforts with Federal, state, and local regulatory agencies
- Establishing an installation-wide affirmative procurement tracking program
- Coordinating affirmative procurement efforts with tenant units
- Establishing metrics for the effectiveness of the program
- Providing input and suggestions to the EPC or ELC on recycling and affirmative procurement efforts (and any other environmentally preferable acquisition activities described in EO 12873, beyond EPA's affirmative procurement program requirements, that the MAJCOM or base desires to initiate).

These activities enable the installation to meet the four RCRA requirements for an affirmative procurement program:

RCRA
Requirement #1:
Preference
Program

In the Preference Program, the installation establishes its preference for recycled-content products. This preference must include Guideline Items. Although the discussion in this Guide focuses on Guideline Items, Air Force activities are encouraged to include other items with recycled content in their preferences as well.

- Working through the EPC, obtain the support of the installation commander and senior staff for the affirmative procurement program. Get the base policy and procedures established in writing, and use it as part of the education program for base personnel.
- In the base Pollution Prevention Management Action Plan (P2 MAP) or in a newly developed Affirmative Procurement Plan (which should be incorporated in the next revision of the P2 MAP), list the EPA Guideline Items and the base's minimum content standards. The minimum content standards for each item will strive to meet or exceed the EPA RMANs, but may vary based on price and availability. Performance standards for recycled-content products may also be included in the Plan.

- The P2 MAP (or AP Plan) also needs to identify specific product acquisition practices. EPA offers many examples in their RMANs, such as reviewing and revising purchase contracts; changing construction projects (in-house and by contract) to include concrete mix designs using fly ash or blast furnace slag; or establishing a process to reclaim vehicle coolants. All complete RMANs may be obtained from AFCEE's PRO-ACT service (please see Appendix D for contact information).

RCRA
Requirement #2:
Promotion
Program

The base's Promotion Program educates base personnel and actively promotes the affirmative procurement program. It is typically spearheaded by the environmental management function and may include the following activities:

- Periodically announce the program in base publications and electronic mail or bulletin board systems. Rather than describing the entire program in a single article, consider highlighting the Guideline Items in a series of articles and describe recent base successes in locating and purchasing recycled products. Be sure base publicity stresses the support of senior leadership for the program, and make sure to print it on recycled content paper!
- Educate the vendor community and the public. Prepare a fact sheet on the base Affirmative Procurement program and make it available at conferences, to potential bidders on base contracts, and to state and local agencies promoting recycling. Discuss recycled-content product requirements at bidders' conferences. Hold a press conference to showcase program successes.
- Develop informational handouts, briefings, or training slides for base personnel, and present them as part of Commander's Calls, base environmental awareness training, Earth Day activities or other appropriate forums. Provide training specifically for IMPAC card holders. Also consider training aimed at technical and contracting personnel, and Supply customers.

- Provide copies of GSA's Environmental Products Guide and DLA's Environmentally Preferred Products Catalog (further described in Section 3.4) or other vendor information to base consumers. These items are accessible through the World Wide Web (see Appendix D for contact information).
- Consider using a facility construction renovation project as a showcase for recycled-content building materials. The Hazardous Materials Pharmacy/HazMart is an ideal location since it is visited by many people.
- Change the NSNs in the supply system so the recycled-content materials are displayed first. Keep recycled-content items available on the shelf in the supply store.
- Counter any reluctance to accept recycled-content products by talking to other bases or AFCEE's PRO-ACT service to see if they have success stories to share. The base affirmative procurement team may also seek volunteer organizations for limited trials of new products, and crossfeed results to other organizations.
- Provide awards and recognition for individuals, squadrons and installations who make notable progress in implementing affirmative procurement programs.

RCRA
Requirement #3:
Procedures for
Vendor
Estimation,
Certification and
Verification

Vendor estimates and certifications will be limited in the affirmative procurement program. The intent is NOT to burden the field or industry with intrusive reporting. Estimates will only be required on contracts valued at more than \$100,000 which include the purchase of any EPA Guideline Items. Contracting officers are responsible to ensure that the latest FAR guidance is incorporated into solicitations and contracts acquiring EPA Guideline Items.

FAR provision 52.223-8, Estimate of Percentage of Recovered Material for EPA Designated Items to be Used in the Performance of the Contract, is required on solicitations greater than the simplified acquisition threshold (\$100,000). Failure to meet the EPA minimum recycled-content standards may make an offeror's proposal non-responsive.

Vendors shall certify that the percentage of recovered material to be used in the performance of the contract will be

at least the amount required by applicable specifications or other contractual requirements. Vendors shall use FAR 52.223-9, Certification of Percentage of Recovered Material Content for EPA Designated Items Used in Performance of the Contract, to meet this requirement. Certifications shall be sent by contractors to the base environmental management function for tracking purposes. The environmental management function will compile and submit this data to their MAJCOMs for rollup to HQ USAF/ILEV annually, in accordance with ILEV instructions.

RCRA
Requirement #4:
Annual
Monitoring and
Review Program

Each installation's effort to specify and purchase recycled-content materials can have great environmental benefits as it is multiplied across Air Force installations worldwide. The base Affirmative Procurement Team will **review and evaluate the installation program's success annually**, using data collected through vendor certifications and any other information the team is able to gather. Some areas to consider:

- Do all purchases of EPA Guideline Items contain recovered material unless specifically exempted? Are the maximum recovered material percentages being achieved? If not, attempt to identify roadblocks and elevate them to the EPC for resolution.
- Have EPA's recommended content standards changed, or is the installation consistently unable to obtain satisfactory items meeting EPA content standards? Have new Guideline Items been added to the CPG? Is the installation now purchasing Guideline Items it did not formerly require? If any of these have occurred, revise the base Pollution Prevention Management Action Plan (P2 MAP).
- Are new recycled-content products or recycling technologies or services available? Crossfeed new information routinely among base organizations. When revising the base P2 MAP, incorporate the new procurement or recycling opportunities.

For an interesting field trip, consider visiting recycled-content product manufacturers in your area. See how wastes generated at your installation can become new

products, and use this information in your recycling program publicity. This contact may also give base recycling program managers new ideas for marketing the installation's recyclable wastes.

SECTION 3.2: Program Responsibilities

Affirmative procurement execution responsibilities reside within many organizations. Without a coordinated effort from the entire team, your program can not succeed. This section describes headquarters level functional responsibilities and provides a model for installation level program execution. Your team should tailor the roles and responsibilities to meet local conditions where appropriate, as long as all required activities are accomplished.

Civil Engineer

The AF Civil Engineer (HQ USAF/ILE) develops policy, advocates for resources, and oversees execution of the AF pollution prevention program. This policy requires installations to develop and execute Pollution Prevention Management Action Plans (P2 MAPs) including management strategies for the affirmative procurement of environmentally sound, recycled products.

- ⇒ **At the installation level, CE's environmental management function** (assisted by the Affirmative Procurement Team) identifies specific opportunities for purchase of compliant products for all EPA-designated items. Recurring purchases of significant quantities are included as action items for consumer organizations in the P2 MAP. The Affirmative Procurement manager and the environmental management function lead a team effort to educate base personnel and provide program publicity. The base recycling program manager is responsible for affirmative procurement data collection and reporting.
- ⇒ **Engineering design personnel** must review specifications for building materials and specify recycled-content construction related Guideline Items. Service contract managers must also review and edit all specifications applying to EPA Guideline Items.

- ⇒ **Quality Assurance Evaluators (QAEs)** for service and construction contracts should focus on affirmative procurement requirements. Their eyes and ears in the field can provide valuable feedback on the success of affirmative procurement and other environmental programs.
- ⇒ **Civil Engineering operations personnel** compose a large segment of the Air Force “consumers” and must also take the actions identified for consumers (below).

Contracting

The Assistant Secretary for Acquisition (SAF/AQ) provides guidance on integrating affirmative programs into the system acquisition process through policies, procedures, training, contract provisions, and Federal Acquisition Regulation changes.

- ⇒ **At the installation level, contracting offices** support base pollution prevention goals by acquiring compliant products for their customers when the purchase requests submitted by requiring activities identify compliant EPA Guideline Items. In addition, Contracting inserts appropriate FAR provisions and supplements and assists the Affirmative Procurement Team in obtaining appropriate certifications from industry. If an item does not comply with EPA Guideline requirements, Contracting should assist the requiring activities, as necessary, in developing the determinations required to purchase noncompliant items. A copy of the approved determination should be maintained in the contract file if a noncompliant item is procured through Contracting.
- ⇒ **IMPAC procedures** will contain instructions to cardholders on purchasing EPA Guideline Items (see sample letter in Appendix C). Contracting offices will ensure cardholders receive training, and perform an annual review to ensure procedures are followed.

Logistics functions

The Deputy Chief of Staff for Installations and Logistics, Supply and Maintenance functions (HQ USAF/ILS and ILM) institutes pollution prevention in logistics processes through policies, procedures, and training.

- ⇒ **At the installation level, Supply personnel** advocate the use of recycled-content products. They maintain copies of the GSA Environmental Products Guide and other government publications identifying recycled-content products. Base Supply provides compliant products from GSA and DLA; ensures that EPA Guideline Item purchases contain appropriate content requirements prior to submission for local purchase; and participates in efforts to educate Supply customers and IMPAC card users about the need to buy recycled.
- ⇒ **LG maintenance organizations** also act as Air Force “consumers” and must take the actions identified below for consumers.

Bioenvironmental Engineering

The support of the Bioenvironmental Engineering Flight will be obtained to determine any possible health risks or undue hazards associated with using or handling recycled-content products or implementing recycling programs. The Bioenvironmental Engineer will inform the users about these potential problems.

Air Force Consumers

Each AF consumer, in every base organization, must take the specific actions identified for them in the base P2 MAP. But identifying these actions will take time, and effective May 1, 1996, consumers already have the responsibility to purchase recycled-content products as called for in the CPG. To meet this responsibility:

- ⇒ **Consumers** should use catalogs such as GSA’s Environmental Products Guide and DLA’s Environmentally Preferred Products Catalog, or other resources listed in Appendix D, to specifically identify and request environmentally friendly products.

- ⇒ **Requiring activities** will define product specifications, including minimum content standards, when buying from outside vendors.
 - ⇒ Do not exclude the use of recovered materials;
 - ⇒ Do not unnecessarily require the item to be manufactured from virgin materials;
 - ⇒ Require the use of recovered materials and environmentally sound components to the maximum extent practicable without jeopardizing item use.
- ⇒ **Consumers** will include the highest percentage of recycled materials possible when making IMPAC card purchases for Guideline Items, consistent with price, availability and performance. A basewide education program about affirmative procurement responsibilities and possibilities is key to accomplishing this effort.

Section 3.4 provides more detailed information about how these actions correspond to the different purchasing routes: stock-listed purchases, local purchases (including IMPAC), and purchases made through service and construction contracts.

Sharing and Using Purchasing Information

When significant new recycled-content purchases are made through any procurement avenue, the requiring activity should provide feedback to the environmental management function through one of the following mechanisms: the environmental representative; the organization's affirmative procurement team member; or locally established reporting procedures. The environmental management function should include this information in the annual revision to the P2 MAP. This will close the loop by:

- allowing the base to take credit toward the pollution prevention goals for compliant product purchases
- sharing product information with other base organizations who buy those items.

SECTION 3.3: Resources

Funds to support the startup and operation of an affirmative procurement program will be obtained in accordance with AFI 32-7001, "Environmental Budgeting," and AFI 32-7080, "Pollution Prevention Program." Pollution prevention funding can be used to cover:

- Startup costs
- Recurring service costs
- Recycling contracts
- Educational and presentation costs

Manpower

The Air Force Affirmative Procurement program relies heavily on a teaming approach for execution. Responsibilities reside within many organizations. Without a coordinated effort from the entire team, the affirmative procurement program can not succeed. Installations most likely will not be able to dedicate personnel solely to the affirmative procurement program; this makes basewide support for the program essential.

Every base organization has the responsibility to be aware of affirmative procurement requirements, and must act as educated consumers. When called on by the Environmental Protection Committee (EPC) or Environmental Leadership Committee (ELC), organizations must also contribute Affirmative Procurement Team members.

SECTION 3.4: Purchasing and Use of Recycled-Content Products

This section provides a discussion of purchasing practices and guidance to consumers for implementing practices to increase use of recycled-content products. Consumers and support organizations, with the leadership of the base Affirmative Procurement Team, need to evaluate their current practices and modify them to acquire environmentally preferable recycled-content substitutes.

Federal Sources of Recycled- Content Products:

Of the EPA Guideline Items, all except re-refined oil may be purchased through **GSA**. GSA offers products in all categories that meet or exceed the EPA requirements.

GSA

GSA is in the process of identifying all remaining Guideline Items, doing market research, and changing their purchase specifications to meet EPA's recommendations for minimum

recycled content where cost-effective products are available. GSA's monthly "Marketips" publication contains information on newly available recycled items. Please see Appendix D for information on how to obtain this and other information from GSA.

Recycled-content products can be ordered from the GSA Federal Supply Service Environmental Products Guide. The current edition focuses mostly on paper products, but the next edition will expand into other EPA categories. All Guideline items listed in this catalog meet or exceed EPA's recommendations, therefore, consumers can be assured they are complying with EPA requirements. GSA has already determined cost effectiveness and compared their products' materials content against EPA recommendations.

Agencies procuring Guideline Items from Federal stock sources are not required to report these purchases to the Federal Environmental Executive (FEE). GSA currently reports its recycled-content purchases for paper and paper products, and will be reporting on additional product categories in the next reporting cycle. Should a base want to know how much of a Guideline Item they purchased from GSA, this information is available. However, customers buying directly from a GSA schedule contractor should note that GSA does not track and report affirmative procurement data for these purchases.

The "GSA Advantage!" on-line shopping service is an electronic ordering system for the products and services offered through GSA, by placing direct delivery orders from commercial vendors such as Office Depot and Office MAX. Please refer to Appendix D for contact information.

GPO

The **Government Printing Office (GPO)** is another source for printing and writing papers, and for environmentally preferable soy-based inks. Please see Appendix D for GPO contact information.

DSCR

DLA's **Defense Supply Center Richmond (DSCR)** is the Federal item manager for packaged lubricating oils. Re-refined 10W30 motor oil is available through the stock system in boxes of 12 one-quart bottles, a five-gallon container or a 55-gallon drum. All of these container sizes

are less expensive than virgin oil. Re-refined 15W40 motor oil is also available from DSCR.

DSCR also offers other environmentally preferable products such as cleaners/degreasers, spill control products, antifreeze recyclers, POLs, extinguishers, toner cartridges, and non-wooden lumber. They publish the Environmentally Preferred Products Catalog (the second edition is currently available) and offer an on-line product ordering service. Please see Appendix D for contact information. As with GSA, DSCR also reports its purchases directly to the FEE, and can provide procurement data on request to installations.

Local Purchases

Requiring activities have the responsibility to review their requirements to see if they include EPA Guideline Items. The "Recovered Materials Determination Form" provided in Appendix C or a locally generated form shall be used to document this process. Customers will order and use recycled-content Guideline Items unless a determination to purchase noncompliant items is approved in accordance with Section 2.3.

Appendix D contains resource information to help consumers and contracting personnel locate commercial sources of recycled-content items. Requiring activities are responsible for preparation and approval of written determinations when they cannot use Guideline Items meeting EPA standards. These determinations should be included with the purchase request and maintained in the contract file when purchases are made by the local contracting activity.

IMPAC purchases must also comply with EPA recycled-content requirements when buying Guideline Items. Written determinations to acquire noncompliant items must be completed and maintained by the requiring activity (see Section 2.3).

Potentially affected contracts include service contracts, such as photocopier support contracts (paper and toner cartridges), custodial contracts (plastic trash bags), and grounds maintenance contracts (mulch and compost) to name a few. Construction contracts frequently require the use of EPA Guideline Items such as insulation, structural

fiberboard, laminated paperboard, cement and concrete, carpet, floor tiles and patio blocks, playground surfaces and running tracks, and compost or mulch.

Requiring activities should develop specifications to ensure that 100% of EPA Guideline Items purchased meet EPA standards unless a determination has been approved for use of noncompliant items. All new specifications should be written and existing specifications amended to express preference for recycled-content products to the maximum extent practicable. Agencies shall not require virgin material or supplies composed of or manufactured using virgin material unless compelled by law or regulation, or unless virgin material is vital for safety or meeting performance requirements of a contract.

“Boilerplate” specifications may be developed and inserted into contracts for Guideline Items. McChord AFB has developed an Affirmative Procurement Plan which contains sections titled “Preference Program” for each guideline category. Language in these sections describes the base’s expectations for vendors supplying these products. This language could easily be used to develop boilerplate specifications. Contact PRO-ACT (please see Appendix D) for a copy of McChord’s plan.

Some EPA Guideline Items will be purchased locally through the Standard Base Supply System. Requiring activities must work with Supply personnel to ensure that item descriptions reflect current EPA content standards when they are forwarded to the Contracting activity for acquisition.

SECTION 3.5: Tracking and Reporting

Tracking and reporting are usually synonymous in program management. Detailed data are collected and reported up the chain. An active attempt is being made in the Affirmative Procurement program to limit the amount of data collected for reporting purposes, while still tracking (monitoring) the program closely enough to ensure it is healthy. Monitoring and metrics will then yield useful information to help the program grow. MAJCOM and base level Affirmative Procurement Teams have the freedom, and the responsibility, to develop tracking procedures that best suit

their business practices. Examples of relevant information follow:

- Does the installation have an affirmative procurement plan, either as a stand-alone plan or as a comprehensive, up-to-date section of the Pollution Prevention Management Action Plan?
- Compile a list of products purchased with recycled content and the range of post-consumer content. It is essential to include EPA Guideline Items, also take credit for other recycled-content items you use as appropriate on your base.
- List examples of new products with recycled content purchased during the year.
- List examples of unique products with recycled content and the percentage of recycled content.
- List “old” products replaced with recycled content products.
- Compile examples on how you’ve advertised your program.

This type of information adds value to the program. Managers who collect this data and review their success in executing the P2 MAP will be able to track program growth, identify weak areas, crossfeed recycled-content product source information between organizations, and create success stories to share with other installations.

Monitoring an installation affirmative procurement program’s health does not require massive amounts of data collection. Instead, **use the team structure to periodically assess progress.** Educate each other and the base consumers; as the program develops, communicate with each other and with shop personnel; and at team meetings, discuss your observations of successes and areas for improvement. Document these observations in meeting minutes and use them as a basis for program improvement, assigning actions to team members as required, and updating the MAP at key intervals. Keep in mind the goal of 100% of Guideline Items purchased with the minimum recycled material content, but do not strive for 100% data collection to verify goal attainment.

Formal Reporting

A limited amount of formal reporting is still required. The AF Resource Recovery and Recycling Program (RRRP) Guide, May 1995, makes the base recycling program manager responsible for reporting on solid waste reduction and affirmative procurement activities. Stock-listed purchases are reported by GSA and DLA, and contracts under \$100,000 are exempt from DoD reporting. Therefore the only activities subject to upward reporting will be contracts with a total value over \$100,000 which include any amount of Guideline Item purchases.

Data Collection

The base environmental flight will collect contractor provided data for purchases of EPA Guideline Items included in contracts valued at over \$100,000. This data will be provided by contractors in accordance with FAR 52.223-9, "Certification of Percentage of Recovered Material Content for EPA Designated Items Used in Performance of the Contract". The base environmental flight will compile the data and submit it to their MAJCOMs for rollup to HQ USAF/ILEV in accordance with ILEV instructions.

The Air Force "Measure of Merit" for the Affirmative Procurement program will be for each base to complete an Affirmative Procurement Plan and establish a program. Formal policy on metrics and reporting will be issued at a later date. There is currently no requirement to report affirmative procurement statistics for IMPAC purchases. But like all good things, this can change if the program is abused. Education is the key to "buying recycled" through IMPAC. Installation education programs must train IMPAC purchasers to be aware of recycled-content standards and "read the labels" when they buy. Buyers should also be cautioned as follows:

- Do not rely on "seals of approval" or on a manufacturer's general claim of environmental "friendliness" for affirmative procurement, unless this claim is specifically backed up with recycled-content percentage information.
- Be sure to differentiate between any recycled-content claims made for the product itself and for its packaging.

SECTION 3.6:
Sample
Affirmative
Procurement
Program
Plans

A “fill in the blanks” Affirmative Procurement Program plan for Federal agencies has been prepared by the FEE. It is titled “Affirmative Procurement Program: Guidance for Contents and Organization.” Electronic copies are available from PRO-ACT (please see Appendix D for contact information). Although this Plan is designed on a large scale, for agencies rather than installations, it is a valuable resource and has been quoted liberally in this Guide. The FEE Plan may be readily adapted for AF use.

How They
Did It:
McChord AFB

McChord AFB, WA, has incorporated a comprehensive affirmative procurement program as part of their Qualified Recycling Program (QRP). Their program is administered by a subcommittee of the installation QRP working group. The subcommittee consists of representatives from the civil engineering environmental and operations flights, logistics, maintenance, transportation, legal, supply, and contracting functions. Nearly one year prior to the mandatory implementation date, the group had already incorporated the newly added EPA Guideline Items into their program. The subcommittee developed and published the McChord AFB Affirmative Procurement Program Plan, which provides comprehensive instructions for affirmative procurement for all affected installation agencies. McChord has compiled their Plan and other resources (recycling logos, program questionnaire, recycling fact sheets, educational bulletins, and metric slides) on a disk for others to use as examples. Copies of McChord’s package are available from PRO-ACT (please see Appendix D).

At McChord, tracking is accomplished as part of the Standard Base Supply System (SBSS). Recycled-content products are “tagged” in SBSS. The process was initially labor intensive, but now enables production of monthly reports.

By preferentially stocking recycled-content products in base supply, McChord has made it easy for their consumers to obtain compliant products. Bonafide requirements for virgin material products are processed as non-recurring requirements. When this system was implemented, base consumers were educated through an explanatory letter. (Please refer to Appendix C for an example.)

Training for IMPAC card users is another critical link. A policy letter was prepared by the Affirmative Procurement program manager, coordinated with other agencies and distributed to card holders. The letter explains the program requirements, describes the Guideline Items and their required recycled-content, and provides points of contact for more assistance. (See Appendix C.)

McChord AFB's award-winning affirmative procurement program relies on individual initiative as well as on teamwork. The affirmative procurement program manager developed a partnership between the environmental flight, the civil engineering design team, and the contracting office. This has resulted in the use of recycled content building materials in base construction projects worth \$120 million. CEV provided the education; design and contracting personnel responded by including the requirements in their process. CEV monitors and assists program success by reviewing design project packages and including affirmative procurement requirements in their review comments.

In summary, McChord AFB's affirmative procurement program proves that a great deal can be accomplished through education and teamwork.